

Honorable Judge Benjamin Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

CLYDE RAY SPENCER

Plaintiff,

v.

DETECTIVE SHARON KRAUSE, and
SERGEANT MICHAEL DAVIDSON,

Defendants.

No. C11-5424BHS

**DECLARATION OF MENONA
LANDRUM IN SUPPORT OF
PLAINTIFF'S MOTION FOR
LEAVE TO TAKE TRIAL
DEPOSITION**

**NOTICE DATE:
Friday,**

Pursuant to 28 U.S.C. § 1746, Menona Landrum declares under penalty of perjury under the laws of the State of Washington and the United States of America that the following is true and accurate:

1) At the time of my previous deposition on March 18, 2013, I resided in Vancouver, Washington. Since my deposition my husband and I moved to Napa, California. We currently reside at The Springs of Napa, a retirement community in Napa, California.

2) I have been contacted about testifying in the case of *Spencer v. Sharon Krause et al.* in January of 2014 in Tacoma, Washington.

3) Traveling to Tacoma would be very difficult for me and my husband. I am 85 years old. While I am able to walk, I do so with a walker. It is difficult for me to walk

DECLARATION OF MENONA LANDRUM IN SUPPORT OF
PLAINTIFF'S MOTION FOR LEAVE TO TAKE TRIAL
DEPOSITION (C11-5424BHS) — 1

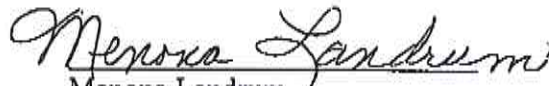
Kathleen T. Zellner & Associates, P.C.
LAW OFFICES
1901 Butterfield Road
Suite 650
Downers Grove, Illinois 60515
630.955.1212 main • 630.955.1111 fax

distances of any great length. I am also the primary caretaker of my husband, Joseph Landrum, who is 84 years of age. Joseph has a heart condition, and he also cannot walk without the use of a walker.

4) While I am willing to testify in this matter, doing so in Tacoma would cause great hardship for me given my circumstances.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 1 day of November, 2013, in Napa, California.


Menona Landrum

CALIFORNIA JURAT CERTIFICATE

State of California

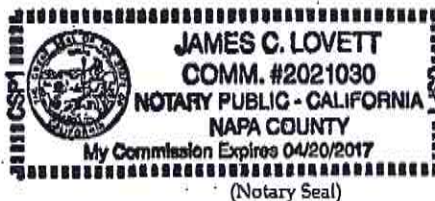
County of Napa

Subscribed and sworn to (or affirmed) before me on this 1st day of November,
2013, by Menona Landrum

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

WITNESS MY HAND AND OFFICIAL SEAL.

James C. Lovett
Signature of Notary Public



OPTIONAL INFORMATION

The jurat contained within this document is in accordance with California law. Any affidavit subscribed and sworn to before a notary shall use the preceding wording or substantially similar wording pursuant to Civil Code sections 1189 and 8202. A jurat certificate cannot be affixed to a document sent by mail or otherwise delivered to a notary public, including electronic means, whereby the signer did not personally appear before the notary public, even if the signer is known by the notary public. The seal and signature cannot be affixed to a document without the correct notarial wording. As an additional option an affiant can produce an affidavit on the same document as the notarial certificate wording to eliminate the use of additional documentation.

DESCRIPTION OF ATTACHED DOCUMENT

United States District Court Western District
Washington at Tacoma No. 11-5424-BHS
(Title of document)

Number of Pages 3 (Including jurat)

Document Date 11/1/2013

Jurat Requested by lawyer
(Additional Information)

CAPACITY CLAIMED BY THE SIGNER

☒ Individual
☐ Corporate Officer
☐ Partner
☐ Attorney-In-Fact
☐ Trustee
☐ Other: _____

DECLARATION OF SERVICE

I hereby certify that on November 5, 2013, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the attorneys of record as follows:

| | |
|--|---|
| Guy Bogdanoich Law, Lyman, Daniel, Kamerrer & Bogdanovich, P.S. P.O. Box 11880 Olympia, WA 98508-1880 Email: gbogdanovich@lldkb.com Attorney for Defendant Sharon Krause | Jeffrey A. O. Freimund Freimund Jackson Tardif & Benedict Garratt, PLLC 711 Capitol Way South, Suite 602 Olympia, WA 98502 Email: jeffF@fjtlaw.com Attorneys for Defendant Michael Davidson |
|--|---|

/s/ Kathleen T. Zellner

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